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Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,

Debtors.¹

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)
)
) **Re: ECF No. 1571**
)

**CERTIFICATE OF NO OBJECTION REGARDING
JOINT MOTION OF THE SETTLEMENT PARTIES AND THE AHG
FOR THE ENTRY OF AN ORDER PURSUANT TO RULE 9019
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
(A) APPROVING (I) THE SETTLEMENT AGREEMENT AMONG
THE PLAN ADMINISTRATOR, VOYAGER DIGITAL LTD.,
VOYAGER DIGITAL HOLDINGS, INC., AND VOYAGER DIGITAL, LLC;
AND (II) THE SUBSTANTIAL CONTRIBUTION CLAIM OF THE
AHG PARTIES IN THE SETTLEMENT AGREEMENT; (B)
APPROVING THE VOYAGER/GOVERNMENTAL CLAIMANTS
STIPULATION; AND (C) GRANTING RELATED RELIEF**

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the
Southern District of New York (the “Local Bankruptcy Rules”), and in accordance with the

¹ The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Wind-Down Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address for purposes of these chapter 11 cases is 27777 Franklin, Suite 2500, Southfield, MI 48034.

Notice of Motion for Joint Motion of the Settlement Parties and the AHEG for the Entry of an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (A) Approving (I) the Settlement Agreement Among the Plan Administrator, Voyager Digital Ltd., Voyager Digital Holdings, Inc., and Voyager Digital, LLC; and (II) the Substantial Contribution Claim of the AHEG Parties in the Settlement Agreement; (B) Approving the Voyager/Governmental Claimants Stipulation; and (C) Granting Related Relief [Docket No. 1571] (the “Notice”), the undersigned counsel for Paul R. Hage, in his capacity as the Plan Administrator (the “Plan Administrator”) for the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166-1] of Voyager Digital Holdings, Inc., *et al.* (collectively, the “Wind-Down Debtors”), hereby certifies as follows:

1. On September 8, 2023, the Plan Administrator, Voyager Digital Ltd., Voyager Digital Holdings, Inc., and Voyager Digital, LLC (collectively, the “Settlement Parties”) filed the *Joint Motion of the Settlement Parties and the AHEG for the Entry of an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (A) Approving (I) the Settlement Agreement Among the Plan Administrator, Voyager Digital Ltd., Voyager Digital Holdings, Inc., and Voyager Digital, LLC; and (II) the Substantial Contribution Claim of the AHEG Parties in the Settlement Agreement; (B) Approving the Voyager/Governmental Claimants Stipulation; and (C) Granting Related Relief* [Docket No. 1571] (the “Motion”).

2. The Notice and Motion were served by the Plan Administrator’s Claims and Noticing Agent, Stretto Inc., as reflected in the *Affidavit of Service* filed at Docket No. 1579.

3. Pursuant to the Notice, the deadline for parties to object or file responses to the Motion was September 26, 2023 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

4. Local Rule 9075-2 provides that the Motion may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the entities that filed the Motion comply with such rule.

5. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline, and the undersigned counsel to the Plan Administrator hereby certifies that as of the date hereof, no objection or other response to the Motion has been filed or served pursuant to the Notice.

6. Accordingly, the undersigned counsel requests entry of the proposed order attached hereto as **Exhibit A** (the “Proposed Order”) at the Court’s earliest convenience.

7. If not entered prior to the hearing, the Settlement Parties will seek entry of the proposed order at the telephonic-only hearing scheduled for 11:00 a.m., prevailing Eastern Time, on October 3, 2023, before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
September 28, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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Administrator*